

LAW OFFICES

BOARDMAN, CARR & HUTCHESON, P.C.

400 BOARDMAN DRIVE
CHELSEA, ALABAMA 35043-8211

MARK S. BOARDMAN
PHILIP F. HUTCHESON*
CLAY R. CARR
ALICIA FRITZ BENNETT
KATHERINE C. HORTBERG
DANA J. BOLDEN
APRIL B. DANIELSON
E. DIANNE GAMBLE*
DANIEL P. OGLE
WILLIAM H. HUFFMAN, III[†]

POST OFFICE BOX 382886
BIRMINGHAM, ALABAMA 35238-2886

(205) 678-8000
FACSIMILE
(205) 678-0000
WEBSITE
boardmancarr.com

May 25, 2006

*ALSO ADMITTED IN LOUISIANA

*ALSO ADMITTED IN MISSISSIPPI

[†]ALSO ADMITTED IN DISTRICT OF COLUMBIA

VIA FACSIMILE AND U.S. MAIL

Michael J. Crow, Esquire
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
P. O. Box 4160
Montgomery, Alabama 36103-4160

VIA FACSIMILE AND U.S. MAIL

Robert D. Drummond, Jr., Esquire
323 De La Mare Avenue
Fairhope, Alabama 36532

Re: *A.G., a minor child; D.A., a minor child; A.L., a minor child; M.K., a minor child; and M.H., a minor child, vs. Autauga Co. BOE, Joseph L. Butler and Terry Wright*
United States District Court, Middle District of Alabama
Civil Action No. : 2:05-CV-1090-W
Our File No. : (242) 050055

Dear Gentlemen:

I am receipt of Mike's letter attempting to reach an agreement on taking the deposition of Mr. Wright before June 22, 2006. Please be advised that pursuant to my letter to both of you, dated January 25, 2006, the defendants have already requested the first depositions of the plaintiffs in this matter. We cannot agree to take the deposition of a defendant prior to the plaintiffs' depositions being taken. Therefore, please provide some proposed dates during the month June when the student plaintiffs and both parents, if both have knowledge of the allegations in the Complaint, can be made available for their depositions. As I proposed in my January 25th letter, we can take an entire family's depositions on one day at the Chapter I Building of the Autauga County Board of Education. After these depositions are completed, we can then discuss taking any defendant's deposition. I look forward to hearing from you regarding possible dates for the plaintiffs' depositions.

Sincerely,

Kate Hortberg
Katherine C. Hortberg

KCH/dpt

cc: Terry Wright

